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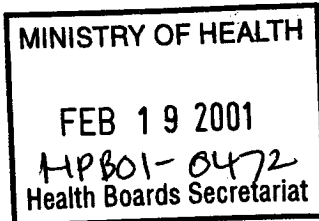
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 File No.: 000334

February 19, 2001

Ms Abby Katz Starr  
 Registrar  
 HEALTH PROFESSIONS APPEAL  
 AND REVIEW BOARD  
 151 Bloor Street West  
 9th Floor  
 Toronto, ON M5S 2T5

Delivered by Fax to 416-327-8524



Dear Ms Starr:

**Re: *Mary Douglas, RN, and the College of Nurses of Ontario***

Please be advised that, as counsel for Mary Douglas, RN, we are asking the Board to review the decision of the Complaints Committee of the College of Nurses dated February 6, 2001.

It will be our position before the Board that the Committee's decision was not only reasonable but correct with respect to the Allegations #1 through #7. The Committee was correct in finding that there was no substantiation of any wrong doing with respect to Ms Douglas regarding the care of Lisa Shore while at The Hospital for Sick Children. Furthermore, with respect to Allegations #3 through #7, having regard to the Coroner's investigation, we will be taking the position that the decision of the Complaints Committee was both correct and reasonable.

We will, however, be asking the Board to determine that the Committee's decision with respect to Allegation #7 was both investigated inadequately and was unreasonable. The Committee reached conclusions based on information obtained in witness statements which was never disclosed to Ms Douglas and accordingly, she was deprived of the opportunity to respond to these particulars. Furthermore, the College failed to interview any of the witnesses who were alleged to have been influenced by Ms Douglas during the course of the Coroner's inquest and other relevant witnesses on this issue. Rather, they chose simply to rely on interviews with those persons provided by the Complainant.

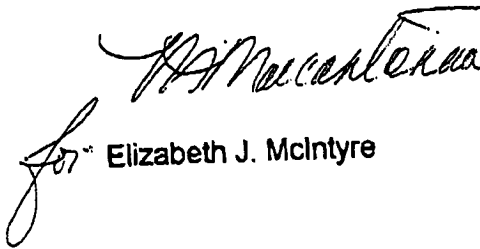
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Finally, with respect to the conclusions reached by the Committee on which they based their decision to caution Ms Douglas, they were unsubstantiated and were unreasonable. This is because it is limited to a speculation as to both the conduct and intent of Ms Douglas. Furthermore, we will be taking the position before the Board that it is not an appropriate role for the College of Nurses to sanction Ms Douglas with respect to possible conduct during the course of the Coroner's inquest and that the proper forum for that issue is the inquest where the Coroner has full powers to make findings and appropriate rulings.

We are requesting immediate disclosure of all information provided to the Complaints Committee in this matter.

Yours truly,

CAVALLUZZO HAYES SHILTON  
McINTYRE & CORNISH



For Elizabeth J. McIntyre

EJM/mm

Copy - Mary Douglas